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January 15, 2021

By PACER

The Honorable Judge Boardman
United States District Judge
Edward A. Garmatz United States District Courthouse
101 W. Lombard St.
Baltimore, MD 21201

RE: *United States v. Vonnelle Winchester*, Crim No CCB-19-0337

Dear Judge Boardman:

I am writing on behalf on Mr. Winchester to a request a modification to his current pre-trial release conditions.

In May 2020, Mr. Winchester was modified to an 8 pm – 5 am curfew with location monitoring. All parties, including Pretrial Agent John Stagg were in agreement. I am happy to report Mr. Winchester is doing well on his curfew and home detention with location monitoring. He has also been gainfully employed at the Amazon warehouse, working over 40 hours a week through the COVID quarantine.

Throughout the past 20 months Mr. Winchester has requested 18 one-day modifications for family outings and other events. There have been no violations or infractions from these modifications. There have been a few events that have been denied, but only due to the timing of the filing and potential COVID exposure.

Mr. Winchester now seeks to be completely removed from electronic monitoring and home detention, and asks to stay on pretrial supervision. The reason is Mr. Winchester is now set for a virtual sentencing on February 2, 2020, and would like the time and freedom to spend with his loved ones and to tie up and lose ends before he turns himself into BOP. I would note, that co-Defendant Derek Williams was removed from home detention and location monitoring prior to his sentencing.

In communicating with Pretrial Agent Stagg, he had no objection since Mr. Winchester has done so well. AUSA Fuchs stated he would object. If a hearing is necessary, we consent to have it done virtually.

Very truly yours,

Mann & Risch, LLC

By: /s/ Tyler Mann
Tyler Mann

Enc.

By e-mail: AUSA Clinton Fuchs
John Stagg, Pretrial Services